

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BERKSHIRE SETTLEMENTS, INC.,
A Georgia Corporation,
CHURCH STREET NOMINEES, LTD.
An Isle of Man Corporation, and
ASSURED FUND,
A Cayman Islands Corporation,

CASE NO.: 09-CV-0006 (FB) (JO)

Plaintiffs

v.

ALEXANDER ASHKENAZI,
An Individual and as Trustee for
HALPERT ALEXANDER TRUST,
A New York Trust,
MALI HALPERT, an Individual,
JOHN HANCOCK LIFE INSURANCE COMPANY
A Foreign Corporation,
CAMBRIDGE SETTLEMENTS, LLC
A New York Corporation,
GLOBAL LIFE SETTLEMENTS, INC.
A New York Corporation, and
JOEL ECKSTEIN,
An Individual.

Defendants.

ASSURED FUND'S MOTION FOR ENTRY OF CLERK'S DEFAULT
AGAINST ALEXANDER ASHKENAZI

Plaintiff, Assured Fund, moves this Court, pursuant to Rule 55 (b)(2) Fed.R.Civ.P., and Local Civil Rule 55.2(b), for the entry of a Clerk's Default against Defendant, Alexander Ashkenazi (hereinafter "Ashkenazi") and states as follows:

1. Ashkenazi was served with the Fifth Amended Complaint on April 30, 2012. Ashkenazi has failed to file any responsive pleading or request an enlargement of time and the time has now extended beyond the twenty (20) days afforded him for a response.

2. Assured Fund requests the Clerk to enter a Notation of Default against Ashkenazi.

I hereby certify that on May 23, 2011, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Eastern District's Local Rules, and/or the Eastern District's Rules on Electronic Service upon the following parties and participants: William Waldner, Co-counsel for Plaintiff, william@waldnerlaw.com; Robert L. Rimberg, Counsel for Halpert rlr@grlawpllc.com, Joe Grob, Counsel for Halpert, joeg@grlawpllc.com; Eric B. Post, Counsel for Hancock, epost@kelleydrye.com; Brian J. Green, Counsel for Cambridge, bgreen@eapdlaw.com; Michael Paneth, Counsel for Global & Eckstein, mpaneth@trefflowy.com, and by mail to Alexander Ashkenazi, 1426 57th Street, 2nd Floor, Brooklyn, New York 11219.

/s/ Charles P. Randall

Charles P. Randall
Lead Counsel for Plaintiff
1200 N. Federal Hwy., #209
Boca Raton, Fl. 33432
TEL: (561) 750-5050
FAX: (561) 750-7272
email: chuck@cprattorney.com